

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

UNITED STATES OF AMERICA,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF TEXAS,  
*ex rel.* ALEX DOE, Relator,

THE STATE OF LOUISIANA,  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER  
TEXAS, INC., PLANNED  
PARENTHOOD SOUTH  
TEXAS, INC., PLANNED  
PARENTHOOD CAMERON  
COUNTY, INC., PLANNED  
PARENTHOOD SAN ANTONIO,  
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

**RELATOR'S UNOPPOSED MOTION TO EXPEDITE BRIEFING AND  
CONSIDERATION OF RELATOR'S MOTION TO COMPEL PRODUCTION  
OF DOCUMENT ON DEFENDANTS' PRIVILEGE LOG**

Relator respectfully requests that the Court expedite consideration of Relator's motion to compel (Dkt. 433). Relator believes the document at issue will be helpful to the Court's consideration of the summary judgment motions and thus expedited briefing and consideration of the motion is necessary. Relator proposes that the Court

order Defendants to file a response by February 24, 2023. Relator will file any reply by February 27, 2023.

Defendants' counsel does not oppose this motion and has agreed to the briefing schedule outlined above. Texas does not oppose this motion.

### **CONCLUSION**

Relator respectfully requests that the Court grant the motion to expedite consideration of Relator's motion to compel (Dkt. 433) and order Defendants to respond by February 24, 2023, with any reply by Relator due February 27, 2023.

Respectfully submitted.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker  
Texas Bar No. 24103325  
Andrew B. Stephens  
Texas Bar No. 24079396  
HACKER STEPHENS LLP  
108 Wild Basin Road South, Suite 250  
Austin, Texas 78746  
(512) 399-3022  
heather@hackerstephens.com  
andrew@hackerstephens.com

***Attorneys For Relator***

**CERTIFICATE OF CONFERENCE**

On February 17, 2023, in accordance with Local Rule 7.1(b), the undersigned certifies that Relator's counsel conferred with counsel for Defendants and for Texas regarding the relief requested in this motion. Counsel for Defendants are unopposed. Texas is unopposed.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2023, this document was electronically filed and served via the Court's CM/ECF system.

/s/ Heather Gebelin Hacker  
Heather Gebelin Hacker